

27/03/2018

**Response to A303 consultation 2018 for CPRE Wilts
Consultation on Highways England's scheme for the A303 between Amesbury and Berwick Down:
response from CPRE Wiltshire Branch**

To whom it may concern,

A303 Stonehenge Consultation

Dear Sir or Madam,

Introduction

CPRE Wiltshire Branch is an independent charity limited by guarantee and affiliated to the CPRE National charity. Our objects are broadly to campaign for a beautiful, living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work in and enjoy, for now and for future generations.

CPRE Wiltshire Branch has been involved in discussions about and proposals for Stonehenge for over 30 years. As a member of the Stonehenge Advisory Forum we helped to prepare successive Stonehenge Management Plans and the current combined Management Plan for the whole World Heritage Site (WHS). Our membership, which numbers approximately 1,000, is kept informed about our activities concerning Stonehenge via our website and newsletter, *Wiltshire Voice*.

CPRE Wiltshire Branch is supported by national CPRE in its strong objection to the current proposals for the A303 at Stonehenge. We support the objections and concerns raised by the Stonehenge Alliance, some of which we also address in this response.

We would like Highways England also to take into account the comments raised in our letter of objection/response to the consultation in 2017(attached), especially under its Question 9.

As in the previous, non-statutory, consultation last year, we are unable to comment fully on the proposals before us owing to lack of detailed information provided in Highways England's consultation documentation.

Our response to Highway England's 2018 Questionnaire concerning proposals for the A303 between Amesbury and Berwick Down.

Question 1. Please provide us with any comments you may have on our proposals for the viaduct crossing of the River Till valley.

CPRE has consistently agreed that a bypass for Winterbourne Stoke is justified on the grounds of road safety and the well-being of the village community. We consider that any bypass should be provided independently of A303 widening through the World Heritage Site (WHS). Little helpful detail has been given on potential impacts on the natural environment in particular, but a single-carriageway bypass would clearly be more suitable in view of the highly sensitive environmental designations involved. We would expect there to be full Appropriate Assessments undertaken in respect of the SACs and protected species associated with the Salisbury Plain SPA. No clear information has been given, for example, on the impacts of the road under construction and in operation on Stone Curlew and Great Bustard populations in the area.

Question 2. Please provide us with any comments you may have on our proposals for the A303/A360 Longbarrow junction.

The scheme proposals for this junction would be wholly inappropriate in such a sensitive location close to the WHS boundary. The archaeology of this area is important and it is impossible at the present time to know what and how much would be lost through scheme implementation.

The scheme during construction and operation would have a major adverse impact on the WHS and on the Winterbourne Stoke barrow group: it would also adversely affect the enjoyment of the WHS by visitors to it. Little or no information has been supplied on signage and lighting, both of which, along with noise, would adversely affect the setting of the WHS.

There are serious concerns about potential impacts on wildlife which cannot be assessed at the present time. Again, there are likely to be impacts on protected bird and animal species. We note the proposals for an extensive works area here during road construction: no information is given about waste water treatment or, indeed, water availability here, especially critical in view of the problems with water contamination and availability at the visitor centre nearby.

Question 3. Do you have any other comments about our proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction?)

Not at present, given that so much relevant information is lacking for informed comment, e.g., on archaeology and natural environment. Major intervention in the landscape here, including extensive dumping of spoil close to Parsonage Down and ground disturbance impacting on archaeology, is of considerable concern.

Question 4. Please provide us with any comments you may have on our proposals for the green bridge (No.4) at or near the western boundary of the World Heritage Site?

It is difficult to understand why this should be considered to be a green bridge. Such bridges are normally wider and placed following careful research and consultation on relevant data to allow passage for animal species: which species are involved here? Would the track across it inhibit animal movements? There is no information about fencing of the bridge or whether it would carry signage for the 4-lane highway underpass beneath it. What is the purpose of the proposed bridge?

Question 5. Please provide us with any comments you may have on our proposals for the cutting on the western approach to the tunnel.

We strongly object to the proposals in view of the WHS designation and the advice of UNESCO's World Heritage Committee in July 2017 to explore options that would not involve dual carriageway cuttings within the WHS.

Question 6. Please provide us with any comments you may have on our proposals for the western entrance to the tunnel.

Again, we strongly object to Highways England's proposals, for the same reasons as given in Q.5, above.

Question 7. Do you have any other comments about our proposals for the central section of the scheme within the WHS?

We presume that the east tunnel portals and new 4-lane carriageway in cutting is included in this question and, once more, we strongly object to these proposals. They would not only severely damage the settings of the Stonehenge Avenue but also that of Vespasian's Camp. They would further interrupt the Nile Clumps in the historic parkland of Amesbury Abbey with the restoration of which CPRE has been involved. Any attempt to restore the integrity of the Stonehenge Avenue would be impossible with the portals situated beside it. Other archaeological interests would also be compromised since the new cutting would be made within a barrow cemetery. Further excavation of the cutting below Vespasian's Camp would create an ugly scar for many years.

Question 8. Please provide us with any comments you may have on our proposals for the A303 flyover at Countess Roundabout.

The impacts of this massive structure would be harmful to the integrity and setting of Blick Mead Mesolithic site, Listed buildings at Countess (including Grade I Listed Amesbury Abbey), the Registered Park and Garden of Amesbury Abbey and the Amesbury Conservation Area. Furthermore, there would be likely adverse impacts on the River Avon SAC (for which an Appropriate Assessment should be undertaken), and on a number of protected animal and bird species known to be present in the area. Little is known about the hydrogeological impacts since coring work is incomplete. Potential impacts on the water table are also unknown at the present time. The visual, noise and air pollution impacts on local residents are likely to be adverse. This proposal is hardly acceptable at the 'gateway' to a WHS.

Question 9. Do you have any other comments about our proposals for the eastern section of the scheme (Countess junction to just beyond the Solstice Park junction)?

No, apart from relevant comments in our answer to Q.8, above.

Question 10. Do you have any comments on the preliminary environmental information provided for the scheme?

The information provided is sufficient to note that there are serious concerns about a number of issues for which not enough data have been given for an informed response. Highways England is clearly not ready to consult sensibly on this scheme and the consultation is premature in this respect.

Question 11. Do you have any other comments you would like to make about the scheme?

CPRE objects to the scheme proposals. In particular, we deplore:

- the lack of scheme options for consultation from the outset that would not damage the WHS or its setting;
- formal consultation on a scheme being brought forward when well over 70% of those consulted non-statutorily on A303 widening with a 2.9km tunnel objected to it;
- progressing of the scheme in the face of advice from UNESCO/ICOMOS advisory missions and the UNESCO WH Centre;
- progressing the scheme in the face of a raft of protective planning policy for the WHS, including the World Heritage Convention, the WHS Management Plan, and Government advice on the care of WHSs;
- the fact that cultural heritage assessment is poor and indicates a misunderstanding of OUV and the importance of the WHS as a heritage asset of the highest significance;
- the lack of information on archaeology, notably of the western part of the WHS and at Blick Mead;
- lack of up-to-date information on geology and hydrogeology;
- frequent misinformation given to the general public in consultation documents and in press and other statements by Highways England, giving the impression to the unknowing general public that the scheme would preserve, protect and enhance the WHS and protect its OUV, despite the fact that it would do nothing of the kind, as advised by UNESCO;
- misleading videos and images showing the scheme without road furniture and heavy traffic, and in daytime so that lighting is not shown;
- continuing lack of data to show that the road scheme would bring economic benefit to the South West; and
- the promotion of a scheme which, on Highways England's own admission, appears to be low value for money on traffic grounds and only low to medium value for money if a hugely damaging tunnel is constructed on the spurious grounds that it would benefit the WHS.
- the inevitable 'knock-on' effects on single-carriageway stretches of the A303 further to the west where proposed 'improvements' are 'expected to be included in a future road investment period' (*Improving Journeys to the South West*, p.9). No analysis has been given of these effects; it is known, however, that 'pinch points, like the Stonehenge stretch of the A303, help to slow traffic and ease congestion along the whole route of the A303.

Patron: HM the Queen; President: Mrs Sarah Rose Troughton, HM Lord-Lieutenant of Wiltshire; Vice President: George McDonic MBE

The Campaign to Protect Rural England Wiltshire

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Working for a beautiful and living countryside, it is active locally and membership is open to all



Campaign to Protect
Rural England
Wiltshire

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Question 12. How did you hear about this consultation?

Letter from Highways England

In conclusion

We hope that the scheme will be abandoned as soon as possible and proper consultation brought forward on a fully informed basis. Any scheme for the WHS should follow the advice of UNESCO, ICOMOS and the WH Committee and the agreed planning policy framework for the WHS.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Anne Henshaw'.

Anne Henshaw

Chairwomen CPRE Wiltshire